

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

SHERI WADE )  
Plaintiff, )  
v. ) Case No. 3:18-cv-00828-MHL  
INTERWORKS UNLIMITED, INC. )  
Defendants. )

**PLAINTIFF'S MOTION FOR LEAVE TO PRESENT EVIDENCE VIA UNSWORN  
DECLARATION IN LIEU OF LIVE TESTIMONY AND TO AMEND WITNESS &  
EXHIBIT LIST**

Plaintiff Sheri Wade (“Ms. Wade”), by counsel, hereby moves the Court, pursuant to Federal Rule of Civil Procedure 16(b) and Federal Rule of Evidence 611(a), for leave to present Dr. Andrew Bogle’s Testimony through an Unsworn Declaration in Lieu of Live Testimony and to Amend her Witness and Exhibit List to reflect the same. Ms. Wade’s basis for this relief is set forth more fully in her Memorandum of Law incorporated by reference and filed contemporaneously herewith.

Respectfully submitted,  
SHERI WADE

By: \_\_\_\_\_ /s/  
Counsel

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